### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JOHN DOE,

Petitioner,

v.

No. 17-cv-2069 (TSC)

GEN. JAMES N. MATTIS, in his official capacity as SECRETARY OF DEFENSE,

Respondent.

# PETITIONER'S UNOPPOSED MOTION TO EXTEND THE TIME TO COMPLETE THE REQUIRED DESTRUCTION OF PROTECTED DOCUMENTS AND INFORMATION

Petitioner respectfully requests that this Court grant his request for an additional sixty (60) days to comply with paragraph 20 of the Protective Order entered on June 15, 2018, ECF No. 103, which requires the destruction of all protected documents and information, and any copies thereof, in the possession of Petitioner's counsel and any experts who have received such information from Petitioner's counsel, within sixty days of resolution of this case.

On November 7, 2018, the Court issued an Order of Dismissal, ECF No. 126, dismissing the action in light of the Joint Stipulation of Dismissal filed by the parties, ECF No 125.

Paragraph 20 of the Protective Order, accordingly, currently requires the destruction of the above-described protected material by January 6, 2019.

Petitioner hereby requests an additional sixty (60) days, until March 7, 2019, to comply with the requirements of paragraph 20 of the Protective Order.

Respondent agrees to this requested extension.

December 27, 2018

Respectfully submitted,

#### /s/ Arthur B. Spitzer

Arthur B. Spitzer (D.C. Bar No. 235960) American Civil Liberties Union of the District of Columbia 915 15th Street, NW, 2nd Floor Washington, DC 20005

Tel: 202-457-0800 Fax: 202-457-0805 aspitzer@acludc.org Jonathan Hafetz (D.C. Bar No. NY0251)
Brett Max Kaufman (D.C. Bar No. NY0224)
Anna Diakun
Dror Ladin (*pro hac vice*)
Hina Shamsi (D.C. Bar No. MI0071)
American Civil Liberties Union Foundation
125 Broad Street—18th Floor
New York, New York 10004

Tel: 212-549-2500 Fax: 212-549-2654 jhafetz@aclu.org bkaufman@aclu.org adiakun@aclu.org dladin@aclu.org hshamsi@aclu.org

#### Counsel for Petitioner

JOSEPH H. HUNT Assistant Attorney General JESSIE K. LIU United States Attorney TERRY M. HENRY Assistant Director, Federal Programs Branch

/s/ Kathryn L. Wyer

JAMES M. BURNHAM
Senior Counsel
KATHRYN L. WYER
Senior Trial Counsel, Federal Programs
OLIVIA HUSSEY SCOTT
Trial Attorney, Federal Programs
U.S. Department of Justice, Civil Division
1100 L Street, N.W., Room 12014
Washington, DC 20005
Tel. (202) 616-8475 / Fax (202) 616-8470
kathryn.wyer@usdoj.gov

Counsel for Respondent

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	_
JOHN DOE,	
Petitioner,	
v.	No. 17-cv-2069 (TSC)
GEN. JAMES N. MATTIS, in his official capacity as SECRETARY OF DEFENSE,	
Respondent.	
[proposed] ORDER	
Before the Court is Petitioner's Unopposed Motion to Extend the Time to Complete the	
Required Destruction of Protected Documents and Information.	
It is hereby ORDERED that Petitioner's unopposed motion for an additional sixty (60)	
days to comply with paragraph 20 of the Protective Order entered on June 15, 2018, ECF No.	
103, which requires the destruction of all protected documents and information, and any copies	
thereof, in the possession of Petitioner's counsel and any experts who have received such	
information from Petitioner's counsel, within sixty days of resolution of this case, is GRANTED.	
The deadline for Petitioner to comply with the requirements of paragraph 20 of the	
Protective Order is accordingly extended to March 7, 2019.	
SO ORDERED.	
Dated:	The Heneralde Tenne C. Clerkler
	The Honorable Tanya S. Chutkan United States District Judge